

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF EAST)	
KENTUCKY POWER COOPERATIVE, INC.)	
FOR A GENERAL ADJUSTMENT OF RATES,)	CASE NO.
APPROVAL OF DEPRECIATION STUDY,)	2021-00103
AMORTIZATION OF CERTAIN REGULATORY)	
ASSETS, AND OTHER GENERAL RELIEF)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO NUCOR STEEL GALLATIN

Nucor Steel Gallatin (Nucor) pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested herein is due on July 23, 2021. The Commission directs Nucor to the Commission's March 16, 2020 and March 24, 2020 Orders in Case No. 2020-00085¹ regarding filings with the Commission. The Commission expects the original documents to be filed with the Commission within 30 days of the lifting of the current state of emergency. All responses in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.

association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Nucor shall make timely amendment to any prior response if Nucor obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Nucor fails or refuses to furnish all or part of the requested information, Nucor shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Nucor shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the direct testimony of Stephen Baron (Baron Testimony), page 26, lines 1–8.

- a. If an annualization adjustment to align the costs and revenues is made for Nucor Gallatin, explain whether such an adjustment should be made for other industries who have either expanded or are new to the system and are known and measurable.

2. Refer to the Baron Testimony, page 26, lines 14–20. Provide an updated cost of service study which includes a pro forma adjustment for the revenues and expenses associated with the new galvanized expansion.

3. Refer to the Baron Testimony, page 33, Table 5. Confirm that Revenue should be Expense.

4. Refer to the Baron Testimony, page 42, lines 10–16, and page 43, lines 1–3.

a. Provide the cost support for the current interruptible credit of \$6.22/kW-month.

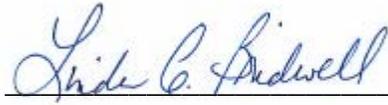
b. Explain whether the locational marginal pricing is more applicable for East Kentucky Power Cooperative (EKPC), Inc. than the PJM Net Cost of New Entry (CONE) given that EKPC is a reliability pricing model (RPM) participant and Kentucky Power Company is a fixed resource requirement (FRR) participant.

5. Refer to the Baron Testimony, page 43, lines 16–19.

a. Provide the ten-minute interruptible load credit for Nucor.

b. Provide the cost support for the current interruptible load credit.

6. Refer to the direct testimony of Cathy Waddell, page 4, lines 9–19. Ms. Waddell states that the impact of the proposed increased will actually be double due to the Nucor's major expansion project that will double Nucor's plant size. Provide support to this assertion given that Nucor is also offered a differing economic development rate.



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DATED JUL 13 2021

cc: Parties of Record

Case No. 2021-00103

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